

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

IN RE:	* Chapter 13
	*
Fay Genice Parm	*
	*
Debtor(s)	* BANKRUPTCY # 21-30214

DEBTOR'S RESPONSE TO MOTION  
FOR RELIEF FROM STAY FILED BY CARVANA, LLC

TO THE HONORABLE BANKRUPTCY JUDGE:

Comes now, Fay Genice Parm, Debtor herein, by and through her attorneys, Edgar J. Borrego/Miguel A. Flores, and respectfully filed her Response to the Motion for Relief from Stay, filed herein by, Carvana, LLC, and would show the Court as follows:

I.

Debtor(s) admit with the provisions in Movant's paragraph 1.

II.

Debtor(s) admit with the provisions in Movant's paragraph 2.

III.

Debtor(s) admit with the provisions in Movant's paragraph 3.

IV.

Debtor(s) admit with the provisions in Movant's paragraph 4.

V.

Debtor(s) admit with the provisions in Movant's paragraph 5.

VI.

Unable to admit or deny the provisions in Movant's paragraph 6 at this time. We will provide additional information, as it becomes available.

VII.

Unable to admit or deny the provisions in Movant's paragraph 7 at this time. We will provide additional information, as it becomes available.

VIII.

Debtor(s) deny the provisions in Movant's paragraph 8 to terminate the automatic stay on the 2019 Jeep Grand Cherokee, VIN#1C4RJEAGXKC776523.

IX.

Debtor(s) deny the provisions in Movant's paragraph 9 to terminate the automatic stay.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that on a hearing of these matters, that the Court deny the Motion for Relief from Stay, in its entirety.

DATED this the 6<sup>th</sup> day of November, 2021.

Respectfully submitted,

TANZY & BORREGO LAW OFFICES, P.L.L.C.  
2610 Montana Avenue  
El Paso, Texas 79903-3712  
(915) 566-4300 Telephone  
(915) 566-1122 Facsimile  
[efile@tanzyborrego.com](mailto:efile@tanzyborrego.com)

By: /s/ Miguel Flores

EDGAR J. BORREGO SBN#00787107  
MIGUEL FLORES SBN#24036574

CERTIFICATE OF SERVICE

I hereby certify that I have served upon the following parties via electronic means as listed on the court's ECF noticing system or by regular first class mail a true and correct copy of the foregoing instrument to Mr. Stuart C. Cox, Chapter 13 Trustee, 1760 N. Lee Trevino Dr., El Paso, TX 79936, to the Debtor, Mrs. Fay Genice Parm, 509 Gentry Way, El Paso, TX 79928, and to Chase Berger, Esq, Attorney(s) for, Carvana, LLC, 9720 Coit Rd, Ste. 220-228, Plano, TX 75025.

DATED this the 8<sup>th</sup> day of November, 2021.

Respectfully submitted,

/s/ Miguel Flores

Edgar J. Borrego/Miguel A. Flores  
Tanzy & Borrego Law Offices, P.L.L.C.

TB#40492/LR